

EXHIBIT 1

SAIRALINA MONTESINO - RE: EEOC v. J & R Baker Farms, LLC, et al

From: David Landrum <dlandrum@d4discovery.com>
To: troethke@glsp.org; dawson@gafr.org; isaac@gafr.org; TIMOTHY.WOJTUSIK@EEO...
Date: 1/22/2015 11:15 AM
Subject: RE: EEOC v. J & R Baker Farms, LLC, et al

D4 is available at 1:30pm today. Let us know.

From: SAIRALINA MONTESINO [mailto:SAIRALINA.MONTESINO@EEOC.GOV]
Sent: Wednesday, January 21, 2015 5:49 PM
To: David Landrum; John Evans; TIMOTHY WOJTUSIK; Isaac Raisner; Dawson Morton <dawson@gafr.org; troethke@glsp.org
Subject: EEOC v. J & R Baker Farms, LLC, et al

All,

Please advise whether you are available for a conference call tomorrow at 2p to discuss some unresolved issues so that we may move forward in this matter. I don't anticipate the call lasting longer than 30 minutes.

Regards,

Sairalina Montesino
Trial Attorney
U.S. Equal Employment Opportunity Commission
Atlanta District Office
100 Alabama Street SW, Suite 4R30
Atlanta, Georgia 30303
T: 404-562-6842
F: 404-562-6905
sairalina.montesino@eeoc.gov

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SAIRALINA MONTESINO - RE: Computers at J & R Baker

From: Ray Perez <rp@wimlaw.com>
To: dawson@gafr.org
Date: 1/19/2015 11:45 AM
Subject: RE: Computers at J & R Baker
CC: jls@wimlaw.com; isaac@gafr.org; SAIRALINA.MONTESINO@EEOC.GOV

Dawson,

My client's IT person is unavailable today due to the holiday but we should be able to set up a conference call tomorrow to go over your questions on the computers at J&R Baker Farms. I'll follow up with you tomorrow to make the arrangements.

Ray Perez

From: Dawson Morton [mailto:dawson@gafr.org]
Sent: Thursday, January 15, 2015 11:19 AM
To: Ray Perez
Cc: Salra Montesino; Isaac Raisner
Subject: Computers at J & R Baker

Hi Ray:

We'd like some more information on the computers at J & R Baker Farms.

- (1) What size hard drive does each desktop have?
- (2) Is the server a rack server or just a desktop used as a server? What size drive does it have? Does it have more than one drive?
- (3) What food safety software does your client have?
- (4) Who established / maintains the network? Is it someone internal or is there an external IT person?
- (5) How is the corporate email operated? Is there an "Exchange" server? Is it webmail? Something else?

Thanks.

--

Dawson Morton
Georgia Legal Services, Farmworker Rights Div.
404-463-1633

SAIRALINA MONTESINO - RE: Call

From: Ray Perez <rp@wimlaw.com>
To: dawson@gafr.org
Date: 1/20/2015 3:56 PM
Subject: RE: Call
CC: SAIRALINA.MONTESINO@EEOC.GOV

I'm glad that I was able to assist you in this process. Please confirm your itinerary for next week once you have planned it out with your tech guys. Also please identify the electronic and hard copy records you would like to inspect and copy so that I can ensure that my client will have them available next week.

I would also appreciate if you could draft a confidentiality agreement on the electronic and hard copy records which provides that such materials may only be viewed by counsel and necessary parties, that the use of such records is only for the lawsuit, that such records are to be destroyed or returned to Defendants' counsel upon the conclusion of the litigation and a claw-back provision on any privileged materials. I know that you have drafted similar agreements concerning these issues in the past.

Thanks,

Ray Perez

From: Dawson Morton [mailto:dawson@gafr.org]
Sent: Tuesday, January 20, 2015 3:11 PM
To: Ray Perez
Cc: Saira Montesino
Subject: Re: Call

Hi Ray:

Thanks for setting that call up. It got a lot of questions answered.

Dawson

On Tue, Jan 20, 2015 at 1:36 PM, Ray Perez <rp@wimlaw.com> wrote:
Just give me the numbers so I can call you in a minute.

Ray Perez

-----Original Message-----

From: Dawson Morton [mailto:dawson@gafr.org]
Sent: Tuesday, January 20, 2015 1:29 PM
To: Ray Perez
Subject: Re: Call

Sure. We have a tech guy and Saida has one too, so like four numbers.

Dawson Morton

> On Jan 20, 2015, at 1:26 PM, Ray Perez <rp@wimlaw.com> wrote:
>
> I was just going to conference you and Saira in if that works for you.
>
>
> Ray Perez
>
> -----Original Message-----
> From: Dawson Morton [<mailto:dawson@gafr.org>]
> Sent: Tuesday, January 20, 2015 1:23 PM
> To: Ray Perez
> Subject: Call
>
> We can do 2 pm. Do you have a call in number or should I find one?
>
> Dawson Morton

--
Dawson Morton
Georgia Legal Services, Farmworker Rights Div.
404-463-1633

SAIRALINA MONTESINO - RE: Quotes

From: David Landrum <dlandrum@d4discovery.com>
To: JEvans@d4discovery.com; SAIRALINA.MONTESINO@EEOC.GOV
Date: 1/27/2015 9:01 AM
Subject: RE: Quotes
CC: troethke@glsp.org; dmorton@glsp.org
Attachments: Forensics Initial Cost Estimate - remote data collection.pdf

Sairalina,

Please sign and return the SOW.

Thanks

David

From: Roethke, Theodore [mailto:troethke@glsp.org]
Sent: Monday, January 26, 2015 6:18 PM
To: David Landrum; SAIRALINA MONTESINO; John Evans
Cc: Morton, Dawson
Subject: Re: Quotes

Hi David,

Don't know if anyone emailed you back yet in this. The EEOC will sign this one. That will happen first thing tomorrow morning.

Ted

From: David Landrum
Sent: Monday, January 26, 2015 4:15 PM
To: SAIRALINA MONTESINO; John Evans; Roethke, Theodore
Cc: Morton, Dawson
Subject: RE: Quotes

What company will sign the SOW? Thanks

From: SAIRALINA MONTESINO [mailto:SAIRALINA.MONTESINO@EEOC.GOV]
Sent: Monday, January 26, 2015 4:00 PM
To: David Landrum; John Evans; Theodore Roethke
Cc: Dawson Morton
Subject: RE: Quotes

Can you confirm that you will accept cc payment. thanks.

Sairalina Montesino
Trial Attorney
U.S. Equal Employment Opportunity Commission
Atlanta District Office
100 Alabama Street SW, Suite 4R30
Atlanta, Georgia 30303
T: 404-562-6842
F: 404-562-6905
sairalina.montesino@eeoc.gov

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>>> David Landrum <dlandrum@d4discovery.com> 1/26/2015 3:57 PM >>>

Let me talk with John Evans to see if the 28th is still free. In the meantime, I will send over the SOW to be signed.

Thanks!

From: Roethke, Theodore [<mailto:troethke@glsp.org>]
Sent: Monday, January 26, 2015 3:42 PM
To: David Landrum; John Evans
Cc: 'SAIRALINA MONTESINO'; Morton, Dawson
Subject: RE: Quotes

Hi David,

Thanks for this. We're going quote 2, except we've been asked to take out the server collection.

This collection will be for January 28, 2015. Can you send over the paperwork to get this confirmed?

Also: we want the hardware for the collection shipped to: Dawson Morton, Esq., Holiday Inn Express, 850 North Veterans Parkway, Moultrie, GA, 31788.

Thanks,

Ted Roethke
Staff Attorney
Farmworker Rights Division
Georgia Legal Services Program
104 Marietta Street, N.W., Suite 250
Atlanta, GA 30303
Phone: (404) 463-1633
Fax: (404) 463-1623

SAIRALINA MONTESINO - EEOC v. J&R Baker Farms - Cost Estimate for EEOC Attached

From: DANIELLA LAMBRIGHT
To: dlandrum@d4discovery.com
Date: 1/27/2015 2:36 PM
Subject: EEOC v. J&R Baker Farms - Cost Estimate for EEOC Attached
CC: DAWKINS, ROBERT; EDWARDS, OTTRELL; MONTESINO, SAIRALINA
Attachments: J&R Baker Farms - David Landrum - Cost Estimate.pdf

Per Ms. Montesino's instructions, I am attaching a copy of the signed Cost Estimate for EEOC regarding the above-referenced matter.

If you have any questions or comments, please do not hesitate to contact Ms. Montesino at (973) 417-3744.

Please confirm receipt of this email. Thank you.

Daniella Taylor Lambright
Paralegal Specialist
U.S. Equal Employment Opportunity Commission
100 Alabama Street, SW
Suite 4R30
Atlanta, GA 30303
Telephone: (404) 562-6850
Fax No: (404) 562-6905

From: Mike Briggs <mbriggs@d4discovery.com>
To: SAIRALINA.MONTESINO@EEOC.GOV
Date: 2/20/2015 12:45 PM
Subject: Remote Data Collect
Attachments: Invoice # 152230.PDF; 500115529_GA Legal_Collection_Service Detail_2.3.15.pdf

Thank you for the opportunity to work with you. Attached please find an invoice related to the above referenced matter. Please review and approve this invoice and forward to your accounting department for payment.

Email ProjectManagement@d4discovery.com regarding changes to contract services.

Email Accounting@d4discovery.com regarding payments, credits, bill to contacts or copies of invoices.

Thanks again for your business and we look forward to our next opportunity.

Disclaimer: Changes to contracted services will not be altered without email confirmation from an authorized D4, LLC Project Manager.

SAIRALINA MONTESINO - RE: ESI

From: Ray Perez <rp@wimlaw.com>
To: dawson@gafr.org
Date: 3/3/2015 11:04 AM
Subject: RE: ESI
CC: SAIRALINA.MONTESINO@EEOC.GOV

For example on page 22 there is a tax return for Rodney Baker and J&R Baker for 2013. Running a search for "tax" will pull it up.

Ray Perez

From: Dawson Morton [mailto:dawson@gafr.org]
Sent: Tuesday, March 3, 2015 11:02 AM
To: Ray Perez
Cc: Saira Montesino
Subject: Re: ESI

Ray I had not noticed anything that appeared to be tax returns can you point me to an example or state what words would be in the file name?

On Tue, Mar 3, 2015 at 11:00 AM, Ray Perez <rp@wimlaw.com> wrote:
Dawson,

Defendants also object to searching any files marked federal or state tax returns. Other than that you may begin your search of the ESI. As previously noted, because of the inability to identify many of the computer files based solely on the path name, Defendants reserve the right to object to any records that are privileged or confidential. Plaintiffs are also under the duty to preserve and maintain any records obtain during this search as confidential and may not use such materials beyond this litigation. Plaintiffs must destroy or return all such ESI at the conclusion of this litigation.

Ray Perez

From: Dawson Morton [mailto:dawson@gafr.org]
Sent: Monday, March 2, 2015 5:00 PM
To: Ray Perez
Cc: Saira Montesino
Subject: ESI

Hi Ray:

I did not hear anything further from you on the Baker ESI, so we are going to proceed with searches of the ESI this week. As we discussed we will not look at files actually containing Ray or Perez in the file name until you confirm whether any privilege applies to those. Although, as we discussed, you think those are just Famous reports your client prepared for you and aren't actually privileged.

Dawson

--

Dawson Morton
Georgia Legal Services, Farmworker Rights Div.
404-463-1633

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Dawson Morton
Georgia Legal Services, Farmworker Rights Div.
404-463-1633